

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

| | | |
|------------------------------|---|-----------------------------------|
| IN RE THE FORMER MARRIAGE OF |) | |
| KENTON GIRARD, |) | |
| |) | |
| Petitioner, |) | Case Number: 25-cv-04586 |
| |) | |
| v. |) | Removed from the Circuit Court of |
| |) | Cook County, Illinois, |
| JANE GIRARD, |) | Case No. 2015 D 9633 |
| |) | |
| Respondent. |) | |
| |) | The Hon. Jeremy C. Daniel, Judge |
| (MARISSA GIRARD, |) | Presiding. |
| |) | |
| Third-Party Respondent.) |) | |

**JANE GIRARD'S MOTION TO ENTER JUDGMENT
ON 7TH CIRCUIT'S SANCTION AWARD**

Respondent, Jane Girard, by her attorneys, and pursuant to Federal Rules of Civil Procedure 58 and 69, seeks the entry of a judgment on the Seventh Circuit's November 25, 2025 sanction award against Third-Party Respondent, Marissa Giarrd, as follows:

1. Marissa Girard removed these state court domestic relations proceedings to federal court on April 28, 2025. [Dkt. No. 1]
2. This Court remanded the matter to state court on May 6, 2025, an order from which Marissa appealed. [Dkt. No. 16]
3. Following the dismissal of that appeal for lack of jurisdiction, the Seventh Circuit, on November 25, 2025, assessed monetary sanctions against Marissa pursuant to Federal Rule of Appellate Procedure 38 in the amount of

\$2,808.75 for lodging a “doubly frivolous” appeal. It did not, however, formally enter a judgment against Marissa or set a date for her to pay. [Dkt. No. 39]

4. As Marissa has thus far failed to voluntarily paid these sums, Jane desires to enforce the Seventh Circuit’s order via the enforcement procedures set forth in Fed. R. Civ. P. 69(a) and 735 Ill. Comp. Stat. 5/2-1402.

5. In order to do so, Jane requires a formal judgment in her favor and against Marissa.

6. A proposed judgment is appended hereto as **Exhibit B**.

WHEREFORE, Respondent, Jane Girard, seeks the entry of a formal judgment in her favor and against Third-Party Respondent, Marissa Girard, in the amount of \$2,808.75.

Respectfully submitted,

BEERMANN LLP

/s/ Matthew D. Elster

One of Respondent’s Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of January, 2026, a copy of the foregoing ***Motion*** was filed via the court's CM/ECF system, which will send electronic notice to all counsel of record who have appeared in this case.

/s/ Matthew D. Elster